

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

_____)	
John Hancock Life Insurance Company, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 03-12501-DPW
)	
Abbott Laboratories,)	
)	
Defendant.)	
_____)	

**PLAINTIFFS' MOTION TO SUBSTITUTE
CORRECTED VERSION OF EXHIBIT M TO AFFIDAVIT OF RAYMOND A.
O'BRIEN IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL**

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "John Hancock") hereby move this Court for leave to substitute (**Under Seal**) Corrected Exhibit M to the Affidavit of Raymond A. O'Brien in Support of Plaintiffs' Motion to Compel Defendant Abbott Laboratories to Produce Documents and Provide Substantive Responses to Certain Discovery Requests, for the original version of Exhibit M, filed **Under Seal** on July 29, 2004. John Hancock also respectfully requests that the Court return to undersigned counsel for John Hancock the original version of Exhibit M, filed **Under Seal** on July 29, 2004, and reflected as Docket Entry 21 in the above-captioned case. John Hancock consulted with Abbott Laboratories ("Abbott") pursuant to

Local Rule 7.1(A)(2), and Abbott does not object to John Hancock filing this Motion to Substitute.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE LIFE
INSURANCE COMPANY, AND INVESTORS
PARTNER LIFE INSURANCE COMPANY,

By Their Attorneys,

/s/ Raymond A. O'Brien
Brian A. Davis (BBO No. 546462)
Michael Arthur Walsh (BBO No. 514875)
Karen Collari Troake (BBO No. 566922)
Raymond A. O'Brien (BBO No. 629753)
CHOATE, HALL & STEWART
Exchange Place
53 State Street
Boston, MA 02109-2891
(617) 248-5000

Dated: July 30, 2004

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company conferred with Abbott Laboratories' counsel on July 30, 2004, and that Abbott Laboratories did not object to Plaintiffs filing this Motion.

/s/ Raymond A. O'Brien